FORM OF ORDER SHEET

Court of	1
,	
Anneal No	2529/2023

	<u>Apr</u>	eal No			2529/20	23		
S.No.	Date of order proceedings	Order or oth	ner proced	edings with	signature (of judge	· · · · · · · · · · · · · · · · · · ·	-
. 1	2	-			3			
1-	05/12/2023		The a	appeal of	Mst. Tel	hmina resub	omitted toda	y by
		Sardar M	uhamm	ad Asif /	\dvocate	e. It is fixed	for prelimi	nary
		hearing	before	touring	Single	Bench at	$\Lambda.\Lambda$ bad	on
					By the	order of Ch REGISTR	_	
				•	•			
							· ^.	
							, ,	

The appeal of Mst. Tehmina received today i.e on 20.11.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and cresubmission within 15 days.

- 1- Check list is not attached with the appeal.
- 2- Appeal has not been flagged/marked with annexures marks.
- 3- Address of appellant is incomplete which may be completed according to rule-6 of the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 4- Annexures of the appeal are unattested.
- 5- In each and every documents the name of the appellant be highlighted.
- 6- Copy of appointment order in respect of appellant be placed on it.
- 7- Annexure-A (Page no. 8 to 15 & 25) of the appeal are illegible which may be replaced by legible/better one.
- 8- Five more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 3633 /S.T,

Dt. 21-11 /2023.

Sardar Muhammad Asif Adv. High Court A.Abad. N. DECISTRAB

REGISTRAR SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

Remond 2 ice 20)

Remond 2 ice 20)

Remond 3 ice 20)

Remond 5 ice 20)

Remond 5 ice 20)

Remond 7 ice 20)

Remond 8 ice 20)

PAKTUNKHWA PESHAWAR

Appeal No.____/2023

Tehmina R/o Teacher Government Girls Primary School Kamiser Torghar.

V/S

Knyher Bakhtukhyus
Service Tribundi

Diary No. 9245

- Secretary elementary and Secondary Education KPK, Secretariat Peshawar.
- 2. Director elementary and Secondary Education KPK Directorate Peshawar.
- 3. District Education Officer (Female) Torghar.

...RESPONDENTS

APPEAL U/S 4 OF SERVICE TRIBUNAL ACT 1974, AGAISNT THE IN-ACTION OF RESPONDENTS QUA TRANSFER OF THE APPELLANT TO THEIR NATIVE DISTRICT I-E MANSHERA FROM DISTRICT TORGHAR DESPITE OF THE FACT THAT APPELLANT HAVE ALREADY SPENT (10 YEARS) MUCH MORE TIME THEN THE STIPULATED/PRISCRIBED PERIOD AS PER LAW AND AS PER CONTRACT SIGNED BETWEEN APPELLANT AND DEPARTMENT.

32011123

AND

NON GRANTING OF BPS-15 TO THE APPELLANT AFTER ALMOST TEN YEARS OF CONTINUES SERVICE, UNLIKE OTHER SIMILAR PLACED TEACHERS OF DISTRICT MANSHERA

AND

BEFORE THE SERVICE TRIBUNAL KHYBER PAKTUNKHWA PESHAWAR

Appeal No. 19/2023

Tehmina Teacher Government Girls Primary School Kamiser Torghar R/o Torghar.

...APPELLANT

V/S

Director Elementary and Secondary Education & Others

....RESPONDENTS

SERVICE TRIBUNAL

INDEX

S.No	Description	Page No	Annexure
1	Service Appeal Along with Affidavit	·	1-5
2	Copy of Appointment Order	"A"	6-9.
3	Copy of One of Affidavit	"B"	16-11
4	Copy of Departmental Appeal	"C"	12-16
5.	VakalatNama		17

...APPELLANT

Date 17/11/23

Through

(Sardar Muhammad Asif)

8

(Muhammad Asjad Pervaz Abbasi) Advocates, High Court Abbottabad



BEFORE THE SERVICE TRIBUNAL KHYBER PAKTUNKHWA PESHAWAR

Tehmina Teacher Government Girls Primary School Kamiser Torghar R/o Torghar.

...APPELLANT

V/S

- 1. Director Elementary and Secondary Education KPK Directorate Peshawar.
- 2. District Education Officer (Female) Torghar.

... RESPONDENTS

APPEAL U/S 4 OF SERVICE TRIBUNAL ACT 1974, AGAINST THE INACTION OF RESPONDENTS QUA TRANSFER OF THE APPELLANT TO THEIR NATIVE DISTRICT I-E MANSHERA FROM DISTRICT TORGHAR DESPITE OF THE FACT THAT APPELLANT HAVE ALREADY SPENT (10 YEARS) MUCH MORE TIME THEN THE STIPULATED/PRISCRIBED PERIOD AS PER LAW AND AS PER CONTRACT SIGNED BETWEEN APPELLANT AND DEPARTMENT.

AND.

NON GRANTING OF BPS-15 TO THE APPELLANT AFTER ALMOST TEN YEARS OF CONTINUES SERVICE, UNLIKE OTHER SIMILAR PLACED TEACHERS OF DISTRICT MANSHERA

AND

AGAINST NON-REDRESSAL OF GREVIANCE OF APPELLANT DISPITE OF REPEATED APPLICATION/PETITION/APPEAL FILED BY THE APPELLANT.

AND

AGAINST THE DISCRIMINATION BEING FACED BY THE APPELLANT AT THE HANDS OF AUTHORITIRS/RESPONDENTS WHEREBY SIMILARLY PLACED EMPLOYEES WERE TRANSFERRED AND APPELLANT ARE LEFT TO FACE RIGORS OF HARD AREAS.

PRAYER:

ON THE ACCEPTANCE OF INSTANT APPEAL THE RESPONDENTS MAY BE DIRECTED TO TRANSFER THE APPELLANT TO THEIR NATIVE DISTRICT I-E MANSHERA AS PER POLICY, FROM DISTRICT TORGHAR, AND RESPONDENTS MAY ALSO BE DIRECTED TO GRANT BPS-15 TO THE APPELLANT LIKE OTHER SIMILAR PLACED TEACHERS AND RESPONDENTS ALSO BE DIRECTED TO TRANSFER APPELLANT, ANY OTHER RELIEF WHICH IS DEEMED FIT AND PROPER IN THE CIRCUMSTANCES BE CASE MAY ALSO BE GRANTED TO THE APPELLANT.

Respectfully Sheweth:

- 1. That, the appellant is hailing from District Manshera and are highly educated, having qualification of MA, M.ED, and B.ED etc.
- 2. That, the appellant were inducted into service on merits as PST BPS-12 in 2013 and 2015 respectively on the strength of District Manshera and were assigned duties to different schools of Torghar, which was once happened to be a provincial administrative tribal area, controlled and managed from District Manshera. (Copy of Appointment Order is attached as Annexure "A")
- 3. That, at the time of appointment, the appellant were directed by the respondents to execute affidavit, individually to the effect that they would serve at torghar continuously for three years without any demand of transfer to their native District nor they would leave the service and after completion of such stipulated period they would be transferred to their own district. The appellant submitted above said affidavit to the respondents. (Copy of One of Affidavit is Annexed as Annexure "B")
- 4. That, besides appellant, there were other teacher who belonged to District Shangla, who were transferred to their District after completion of period of three years as were mentioned in affidavit, and few of them transferred to District Manshera recently.
- 5. That, since appointment, the appellant were serving at District Torghar, and on completion of agreed period of three years, the appellant moved many application to different forums for their transferred as per law, to their own District but in vain. (Copy of Departmental Appeal is Attached as Annexure "C")
- 6. That, the appellant had been serving the department since 2013 and are still working in BPS 14 to some of the appellant and other are still in BPS-12 unlike other similar teachers of other Districts who had already been granted BPS-15 which itself is a classical example of discrimination. The appellant is entitled for the same scale i-e BPS-15.
- 7. That, the appellant filled a complained/appeal to the respondents for the redressal of their grievance which has not been decided up till now, hence instant appeal.

Feeling aggrieved from above mentioned in-actions and discriminations of respondents, the appellant have come to this honorable Court on the following inter-alia amongst many other grounds:-

3

GROUNDS:

- 1. That, the in-action of non-transferring of appellant to their own District even after spending much more time than stipulated period of three year is illegal, unlawful, perverse, unilateral and against the settled principle of natural justice and fair play.
- 2. That, as per government policy regarding hard areas, the civil servant must be transferred after one year maximum.
- 3. That, a lot of similarly placed teachers had already been transferred to their District more particularly District Shangla. Non-transferring of appellant is nothing but to corner the appellant and the appellant is simply victimized of discrimination by the respondents.
- 4. That, the appellant is female and have to travel for 3 to 4 hours continuously to reach at their destination with fare of almost Rs. 4,000/- per trip, even then the grievance of appellant are not being redressed.
- 5. That, the appellant had been serving the department since 2013 and are still working in BPS 14 to some of the appellant and other are still in BPS-12 unlike other similar teachers of other Districts who had already been granted BPS-15 which itself is a classical example of discrimination. The appellant is entitled for the same scale i-e BPS-15.
- That, despite of the continues application/ appeal/ petition/complaint the appellant are still waiting for justice, but a duff ear turn towards them.
- 7. That, even the transferred policy of the government is put in abeyance by the respondents and the appellant is constrained to serve at the place for along eleven years, which is otherwise hard one.
- 8. That, other point would be raised at the time of arguments.
- That, the appeal in hand is well within time.
- 10. That, the honorable court has exclusive jurisdiction to adjudicate and proper court fee has been annexed.
- 11. That, notices of appeal in hand has also been issued to respondents.



PRAYER:-

IT IS THEREFORE, HUMBLY PRAYED THAT ON THE ACCEPTANCE OF INSTANT APPEAL THE RESPONDENTS MAY BE DIRECTED TO TRANSFER THE APPELLANT TO THEIR NATIVE DISTRICT I-E MANSHERA AS PER POLICY, FROM DISTRICT TORGHAR, AND RESPONDENTS MAY ALSO BE DIRECTED TO GRANT BPS-15 TO THE APPELLANT LIKE OTHER SIMILAR PLACED TEACHERS AND RESPONDENTS ALSO BE DIRECTED TO TRANSFER APPELLANT, ANY OTHER RELIEF WHICH IS DEEMED FIT AND PROPER IN THE CIRCUMSTANCES BE CASE MAY ALSO BE GRANTED TO THE APPELLANT.

APPELLANT

Date 17/1/22

Through

(Sardar Muhammad Asif)

ጲ

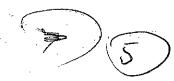
(Muhammad Asjad Pervaz Abbasi) Advocates, High Court Abbottabad

VERIFICATION:-

Verification on oath that contents of the foregoing appeal are true and correct to best of my knowledge and belief and nothing concealed from this honorable

tribunal.

APPELLANT



BEFORE THE SERVICE TRIBUNAL KHYBER PAKTUNKHWA PESHAWAR

Tehmina R/o Teacher Government Girls Primary School Kamiser Torghar.

...APPELLANT

V/S

Secretary Elementary and Secondary Education & Others

...RESPONDENTS

AFFIDAVIT

I, Tehmina R/o Teacher Government Girls Primary School Kamiser
Torghar, solemnly affirm and declare on oath that the contents of the
titled "Instant Appeal" are true and correct to the best of my knowledge
belief and nothing has been concealed from this honorable court.

Date. 12/11/27

-DEPONENT

OFFICE OF THE MISTRICH KOUSATION ENFICER (FEMALE) TOOK GHAR WAL

Consequent upon the recommendations approval of the District selection committee To mosting hold on 18/01/2013 the Competent Authority is pleased to appoint the following fresh trained Female candidates on morit having the prescribed qualification in 805 12(05,7000 - 500-22000) plus usual allowances as admissible under the rules against the vacant post of PST (Female) mentioned against each their names on regular basis under the existing policy of the Provincial Govt: on terms and conditions given below with effect from the date of their taking over charge in the interest of public service .

"Tappa Wise" District Tor Ghar

						1=			
5.No	Candidate NAME -	Father's Name	Tappa	Quail:	Score	·School/Station where posted	Zone	Remarks	
	Sumaira Gul	Muhammad Ismaeel	Hassan : Zai	BA	42.41 -	GGPS Mareer (HZ)	Summer	Against V /P	İ
7	Farzana Habib	Habib Khan .	Bassikhail	BA	42.38	(GGPS Gul Dheri (BK)	Sunimer	Against V /P	1
	Saba Gul	Shah Jahan	Mada Khali	ΒΛ	42.05	GGPS Maira Mada Khail	Summer	Against V /P	.l

"Open Merit" Adjacent Districts

				 -				
S.N 0	Candidate Name	Father's Name	Domicile	Quall:	Score	School/Station where Posted	Zone	Remarks
1	Ayesha Humma Swati	Muhammad Shaukat Khan	Manselma	MSc	77.80	GGPS Paloso (HZ) , ; s	Suntmer	Against V /P
2	Adeela Shaukat Swall a	Muhammad Shaukal Khan ayan Marakal	Mansehra	MSc **	75.70	GGPS Garhi (MZ)	Sinneter	Against V /P
3	Faiza Tabassum	Muhammad Bashir	Мапзеђга	MSc	75.65	GGPS Geeta (BK)	Winter	Against V /P
,,,	Aisha Bibi	Facir Mühanimad	Mansehra	MSc of	75.06	- 3GPS Kand Bala (BK) in the	Summer	Against V /P
.5	Nosheen Kanwal	Sikandar Hayal	Mansehra	,MA	65.80	rigps Gul Dalree (BK)	Summer	Against V /P
-6	Phool Bibl Scaring	Muhamad Farooq	Mansehra es205%	MAXX.	64.11	GGPS Zeezari (BK)	Summer	Ageinst V /P
• 7	Raham Bibi	Zamanat Khan	Shangla &	BSc	63.78	GC PS Khadang (AZ)	Summer	Against V /F
8	Safia Bibi	Syed Sultan Shah	Mansehra	MV	63.13	GG PS Kand Paayeon (AZ)	Winter	Against V /P
9	Sadia Shoakat	Muhammad Shoukal	Mansehra	MA	62.64	GG 25 New Killay (HZ)	Summer	Against V /P
1C	Bibi Saceda tun Nisa	Oari Abdul Rashid	Mansehra	MA	 	GC PS Bimbal (AZ)	Summer	Against V /P

Office Order/Appointment

Consequent upon the recommendation approval of the district selection committee tor ghar in its meeting held on 18-01-2013 the competent authority is pleased to appoint the following fresh trained female candidates on merit having the prescribed qualification in BPS-12 (Rs.7000 500-22000) plus usual allowances as admissible under the rules against the vacant post to PST (Female) mentioned against each their names on regular basis under the existing policy of the Provincial Govt on terms and condition given below with effect from the dates of their taking over charge in the interest of public service.

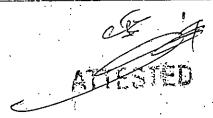
"Tappa Wise District Tor Ghar

S.N	Candidate Name	Father Name	Tappa	Quaif	Score	School/Station	Zone	Remarks
0			1		,	where posted	i . <u>j</u>	
1	Sumaira Gul	Muhammad Ismaeei	Hassan Zai	BA	42.41	GGPS Mareer (HZ)	Summer	Against V/P
2	Farzena Habib	Habib Khan	Bassikhail	SA	42.38	GGPS Gul Dherl (BK)	Summer	Against V/P
3	Saba Gui	Shah jahan	Mada Khail	ВА	42.05	GGPS Maira Made Khaii	Summer	Against V/P

"Open Merit" Adjacent Districts

S.No	Candidate Name	Father Name	Domicilo	Quaif	Score	School/Station where posted	Zone	Remarks
1	Ayesha Humma Swati	Muhammad Shaukat Khan	Manschra	MSc	77.88	GGPS Palosa (HZ)	Summer	Against V/P
2	Adeela Shaukat Swati	Muhammad Shaukat Khan	Mansehra	MSc	76.70	GGPS Garhi (HZ)	Summer	Against V/P
3	Faiza Tabassum	Muhammad Bashir	Mansehra	MSc	75.65	GGPS Geeto (BK)	Winter	Against V/P
4	Aisha Bibi	Faqir Muhammad	Mansehra	MSc	75.00	GGPS Kanda Bala (BK)	Summer	Againşt V/P
5	Nosheen Kanwai	Sikander Hayat	Mansehra	MA	65.80	GGPS Gul Dairee (BK)	Summer	Against V/P
6	Phool Bibi	Muhammad Farooq	Mansehra	MA	64.11	GGPS Zeezari (BK)	Summer	Against V/P
7	Raham Bibi	Zamanat Khan	Shangla	5Sc	63.78	GGPS Khadang (AZ)	Summer	Against V/P
8	Şafîa Bibi	Syed Sultan Shah	Mansehra	MA	63,13	GGPS Kand Paayeen (AZ)	Winter	Against V/P
9	Sadia Shoakat	Muhammad Shoukat	Mansehra	MA	62.64	GGPS New Killay (HZ)	Summer	Agalnst V/P
10	Bibi Saeeda tun Nisa	Qari Abdul Rashid	Mansehra	MA	61.80	GGPS Bimbal (AZ)	Summer	Against, V/P
15	Sobia Bibi	Abdul Hamid	Mansehra	MA	58.74	GGPS Bimbai (AZ)	Summer	Against V/P
12	Rama	Aurangzeb	Mansehra	MA	58.64	GGP\$ Judba	Summer	Against V/P
13								Against V/P
14	Zahirat 8ibi	Rahim Shah	Shangla	BSc	58.00	GCPS Kander (BK)	Summer	Against V/P
15	Nazia Haroon	Muhammad Haroon	Mansehra	AM	57.16	GGPS Gangi (HZ)	VVinter	Against V/P
16	Shagulia Bibi	Hazrat Youngs	Shangla	MA	55.89	GGPS Cirapa Biratoni (BK)	Winter	Against V/P
17	Tahira Bibi.	Abdul Qayyum	Mansehra	BSc	53.52	GGPS Arbay Jalband (AZ)	Winter	Against VIP
18	Farheena Ali Akbar	Ali Akbar	Mansehra	MA	55.42	GGPS Murala (AZ)	Vvinter	Against V/P
19	Pari Had	· Aniullah	·	MA	55,17	GGPS Khanday (8K)	Winter	AgainsV/P

		•						(~ \	
J.	ا مسب			00	2	Ago		(3)	; í
		•		(8)		(D)):	٠.,	Jbc.
= - +		Shabina .	Muhammad ភូពការបា	Manselva	.MA	52.57	1995 ludia No. II	Summer	. ^ ¢
· E	2.17	IGazala 151 (Parti 1977)	af al-iduhannind libora-	f Shariplar &	Fold MADES A	52.41°	TOP 1 100 (10)	Winter	490
40)	Bushra Iqbel	Muhamtoud ighal	ผลเราไทย	Ma	52.3 <u>2</u>	THEF'S Complay (AZ)	Witter	eqal :
19:42	ES.	Nestrabse Hill The Control	Muleumand felicies	Horipin	MA				i ≽ Apal i
42	2	Tehmina Bibl	Col Returns	Manachia	CIA	151,97	O(3)-2 RANG 3 (HZ)	Winter	
4:	3 -	Rabia Bibi	Aurany Zeb	Manselaa	744	51.06	GGPS Taigram (HZ)	Winter	Agai
######################################	4.3	Wzina Farazpine 7	Sarlaraz Khan (1977)	Marisehra	MAY CO	51.60?	ĞĞĞPS.KUŞAÇ(NIÇ)¥	Summer	Age?
. 4:	5	Shahida Bibl	Moulvi Muhammad Zaman	Mansehra	MA	61.66 ;.	GGPS Kotlay (NK)	Summer	Agair
	X	Rizwana:Bibiza	-HayderdZarffarff 12	Mansehran	See MA	√ 5 1.56	(GGPS Shollour (HZ)	Winter	Aŋair
. 4	7	Saima Khaloon	Noor Rehman	Mansehra	MA	51.51	GGPS Wurata (AZ)	Winter	Again
	8	AisharBeguni William	ajiMuhammadiKhank	Mansehrak	Jac MA July	<i>19स दुरम</i> ६ 51.47	.9975 Milindo (72)	TO THE	in Edition
	977	esajeda Bibli	Rozi Khan Aren an	Shangla	TEMAN A	\$) 51.39≾	⊭GGPS Kårbon (BK)	Winter	Again
.5	0	Trum Bashir	Muhammad Bashir	Manselira	MA	51.29	GGPS Karna (HZ)	Summer	Λgain
5	51	Rubi Islamul Haq	Islamul Haq	Mansehja:	MΛ	51.10	GGPS Dour Payeen (BIC)	Summer	Again
(\ 52 <i>)</i>	Rabia Khaloon	Molvi Muhammad Zamen	Manschra	MA ·	on sa	GGPS Karna (HZ)	Summer	Again
100	92(20)	Jun Shahzadi.	-Abdul-tianiaed: nuseria	apare are	BENEVALAP. SE	60.51	The state of the s	The state of the s	779
	فنناء	Canoni Cara Cara Cara Cara Cara Cara Cara Car	Muhammad	يورين ما د متوريخ. ا	Squitzer de la caracter de la caract	50.51	GGPS 900 65 No. 1	វិទីបីភាពិថៃក្រ។	≏"Agair F
. 125	Ų.	ysiuna.Hamayun So. 33.5	F - '	Manselva:	PINBALLY.	50.42	ŢſĠĞ₽ŞŞhġkati (ĤZ)	Winter	Agair
5	5	Naila Bibi 、	Muhanenad Iqbal	Manseina	MA	50.14	GGPS Murado (AZ)	Winter	Agaiı
5	6	Naila Bibi	Sain Muhammaad	Малѕена	⊹MA .	50.01	· GGP5 Ormal (HZ) • V	Summer	Agair
			Muhammad Rehan .	E pierre parameter			•		
7,350	Vint.	RGUIRehanaen (ross)	China de la companya	Marisonia?	Company of the	7.49.75°	〒GCBS*Kamapl:Banda!(MK)音がなけずまか さん・デンスをとっている	: Summers	∭Aqəi
5	8	Bibi Salma Naghar	S.Pir Azam Shah	Manselva	MA	49.72	GGPS Savey Narange (AZ)	Winter	Agair
		Rader	. 	KShangla 🔭 K) 🎻 🎎	.	49:37	्रें द्वेदिक इंदोन विद्योग	Winter	Agair
\Rightarrow	60	Saiga Idrees	Muhammad Aurees	Mensehra t	MA	49.27	GGPS Bugdo (HZ)	Summer	Agai:
1 56	1	sRoobina Bibis Ale	Sherin Zeu X St. 30	Shangle	MA	48.68	GGPS Noor Kaleem (BK)	Winter	Again
, 6	52	Bibi Farzana Rehman	Noor or Rahman	l Mansehta	MA	48.87	GGPS Kalsoona (MK)	Winter	Agai



58	Bibi Salma Nigar	S.Pir Azam Shah	Mansehra	MA	49.72	GGPS Savey Narangi (AZ)	Winter	Against V/P
59	Rafat	Nasir Uddin	Shangla	MA	49.37	GGPS Sorai (BK)	Winter	Against V/P
60	Saiqa Idrees	Muhammad Adrees	Manselira	MA	49.27	GGPS Bugdo (HZ)	Summer	Against V/P
61	Roobina Bibi	Sherin Zeb	Shangla	MA	48.88	GGPS Noor Kaleem (BK)	Winter	Against V/P
62	Bibi Farzana Rehman	Noor ur Rehman	Mansehra	MA	45.87	GGPS kelscona (Mk)	Winter	Against V/P
63		Mir Afzal	Mansehra	MA	47.07	GGPS Bugdo (HZ)	Summer	Against V/P
64	Tanzeela Aman	- Malik Aman	Mansehra	MA	47.81	GGPS Chirakot (MK)	Summer	Against V/P
65	Naseem Akhter	Qari Abdul Rehamn	Mansehra	BA	47.80	GGPS Chirakot (Mk)	Summer	Against V/P
66	Sharefet Bibi	Baktiyar	Shengla	8A	47.73	GGPS Noor Kaleem (BK)	Winter	Against V/P
67	Dilshed Begum	Hayat Uilah	Marisehra	BA	47.00	GGPS Simiai (HZ)	Winter	Against V/P
68	Bibi Tayyab	Muhammad ilyas	Mansehra	BA	47.64	GGPS Bando Dost Muhammad (AZ)	Summer	Against V/P
69	Maila Waqar	Waqar Ahmed	Mansehra	ВА	47.54	GGPS Balkot.(NK)	Summer	Against V/P
70	Shabina Shezadi	Muhammad Haroon	Mansehra	MA	47.30	GGPS Kamal Banda (MK)	Summer	Against V/P
71	Sahira Bano	Khan Sardar Khan	Mansehra	BA	47.20	GGPS Kand payee (AZ)	Winter	Against V/P
72	Adiba Afzal	Muhammad Afzal	Mansehra	BA	46.34	GGPS Khadang (AZ)	Summer	Against V/P
73	Shamaila Hussain	Muhammad Hussain	Mansehra	BA	46.77	GGPS Doga (MIC)	Summer	Against V/P
74	Salma Bibl	Khan Aurang Zeb	Mansehra	BA	46.75	GGPS Doba (Mk)	Summer	Against V/P
. 75	Haseena Bibi	Muhammad Pervez	Mansehra	БА	46.72	GGPS savey Narang (AZ)	Winter	Against V/P
76	Shamim Akhter	Abdul Karim	Shangla	MA	46.59	GGPS Ormal (HZ)	Summer	Against V/P
7 7	Momina Bibi	Sultan-e-Room	Shangla	BA	46.61	GGPS Deri Kaka Khail (BK)	winter	Against V/P
78	Bibi Javeria	Abdul Aziz	Mansehra	BA	49.55	GGPS Daro (AZ)	Winter	Against V/P

Disable Quota (02%)

						1.0	City Chambers
1 Nakhtar Begum	Mutabar	Shangla	I FA	31.26	GGPS Baddar (BK)	Summer	Against VIP
			F- A	00.70	GGPS Kander (Bk)	Summer	Against V/P
2 Rabia Bibi	Muhammad Saeed	Shangia	L FM	- 28.78	GGPS Kander (Bk)	0 0 1	Tracarrage VII

TERMS AND CONDITIONS:

- 1. Their services will be considered regular but without pension & gratuity in terms of section-19 of the NWFP Civil Servant Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2005 they will however be entitled to contributory Provident Fund in such a manner and at such rates as prescribed by the Government.
- 2. The appointees who are already in Govt: service and working against a pensionable post on regular basis before 1st day of July 2001 without any service break, on application to the Competent Authority/this office through proper channel are appointed and allowed choice of option either to retain benefit of pension and gratuity as allowed to them under their previous.

man grant the first first Disconstanting of German State of the State of th John Committee Committee of the Committe - As it sit by it be a 1384119994-2

BETTER COPY

legen 4

it de

BUX Justus

13503-295774-2

مودباندگزارش کی جاتی ہے کہ 2<u>01</u>3ء میں ضلع مانسمرہ سے ضلع تو رغر تغینات کئے گئے تھے۔اس شرا کظے ساتھ کہ میں تین سال بعدا ہے ضلع ٹرانسفر کر دیا جائے گا۔ تکر گیارہ سال ہونے کو ہیں اور ہمیں ٹرانسفر نہیں کیا جار ہا۔

جبکہاس دوران 145 ساتذہ اور ضلع تو رغر ہے تعلق رکھنے والی اساتذہ سفارش اور اعلی تعلقات کی بناء پر اسپنے اصلاع ٹر انسفر ہوچکی ہے۔ بیرسب آئی کے علم میں ہے۔

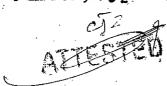
جناب عالی! DEO (Female) و ترک نے ہم ہے وعدہ کیا تھا کداب ایک یا دو نیچرز تورغ ہے ٹرانسفر نیل موقع ہے۔ بنا ہے مالی ایس مر بکواور رضوانہ جی جی ایس موگائی شاہم ہ اور ایسٹ آبدا ٹرانسفر ہو چکی ہیں۔ کیا ان کے جنا ہے ہے Staff Gap نہیں ہوگا؟؟ کیا سکول بند نہیں ہوگا؟؟ کیا سکول بند نہیں ہوگا؟؟

جناب عال!

ہم تو آپ ہے انعاف کی امید نگائے ہوئے ہیں جبکہ ہمارے ساتھ کھیل کھیلا جارہا ہے۔ ٹازید زیب Appoint ہوئی مران Appoint و کی مرز انتفر ہم ہے پہلے ہورہی من سمیا بی بی 2016 میں Appoint ہوئی مران کی فران میں میائی مرز انتفر کو جس سال کرز چکا ہے۔ اور اس ساتو رخر ڈو میسائل ہولڈ تھیں۔ س قدر زیا دتی کی جارہی ہے۔ ہمارے ساتھ اس کیے ہمارے یا سی کوئی بری سفارش نہیں؟؟

جناب عالی! صلح مانسم و سے جرتی ہونے والی چند اساتذہ کوسکیل 14 دیا گیاہے جس میں شرط یہ کھی گئی میں کر ط یہ کھی ک ختی کہ اگر سکیل 14 لیا تو NOC نہیں دی جاسکے گی۔ اگر سکیل 14 لینگے تو ٹرانسفری صورت میں آپ کوسکیل 14 متنی کہ ایک اندازہ اس بات سے لگایا جا سکتا ہے کہ ہم نے تعلیمی قابلیت ہوئے کے باوجود سکیل نہیں لیا کیونکہ ہمارے گھر یکو حالات بہت زیا وہ ٹراب بین ہمارے شروں کے رحم و کرم پر بل رہ باوجود سکیل نہیں لیا کیونکہ ہمارے گھر یکو حالات بہت زیا وہ ٹراب بین ہمارے شیح دو سروں کے رحم و کرم پر بل رہ باوجود سکیل نہیں لیا کیونکہ ہمارے گھر یکو حالات بہت زیا وہ ٹراب بین ہمارے شیح دو سروں کے رحم و کرم پر بل رہ بین ہمارے گھر یکو حالات بہت زیا وہ ٹراب بین ہمارے شیح دو سروں کے رحم و کرم پر بل رہ بین ہمارے گھر یک میں ہوئی ہیں۔

جناب عالى! ترقى كے نيس جاہے اگر بم اپنے گروں سے ديونى برقرادر كھ كتے تو بم سكيل 14 لازى ليت



(3)

11سالوں ہے ہم سکیل 12 میں ہی ڈیوٹی کررہے ہیں۔

جناب عالیٰ! آپ کے پاس اپنسکول چلانے کیلئے گئی اور داستے ہیں ہماری زندگیاں قربان کرنے کا داستہ
کیوں؟؟؟ ہم ساری زندگی تورغر کے نام نہیں کر سکتے۔ ہمارے بیچ دوسروں کے رحم وکرم پر رہ رہے ہیں۔
ہمارے گود کے بیچ آئے روزئ نئی بیماریوں میں مبتلا ہوگئے ہیں اور آپ ان تمام باتوں سے بخو بی آگاہ ہیں۔
لہذا تمام ٹیچرز کا آپ سے پروز ورمطالبہ ہیکہ ان ٹیچرز کی ٹرانسفر کوروکا جائے یا پھر ہم سب کوایک ساتھ ٹرانسفر
کیا جائے۔ بصورت ویگر ہم عدالت کا رخ کریں گے۔ سیکرٹریٹ جائیں گے۔ سکول بند کریں گے اور جو مناسب ہوا
سیخ تی کے لیے کریں گے۔ ضلع مانسم وسے تعلق رکھنے والی اساتہ ہو کے نام مندرجہ ذبل ہیں۔

الرقع: 20-07-2023

<u>20-07-2</u>	023. [9/1]			ł
2 acr	13501-1295774-2	جی جی پی ایس بمبل	بى بى سلىن نگار	_
0 10 0	13503-0491117-0	جی جی پی ای <i>س کرنل حسن</i> زئی	رابعه خاتون	_1
2 hou	13501-3879556-0	جي جي پي ايس بگدو	صاعقته	_94
	13501-9098694-6	جي جي پي ايس جلبنگ	ناكله بي بي	- [4]
NO	13503-5580290-8	جى جى پي ايس كمال باغذه	بشره بي بي	_0
Sarwa	~13504-7245998-6	جي جي پي ايس بانڏه دوست جي	صائمه بي بي	°
6	13501-0421418-	جی جی پی الیس دارو 🔻 🔈	تنزيليامان	_4
	13501-12898	جی جی پی ایس اورل 🕜 – 🖔	نائله بي بي	-1
\$\times_{\time	13504-948480	1-6 ين ايس لم <i>ي</i> الم	روبينه بي بي	4
Talun	12504-169173	ه جی جی بی ایس کردهی جد به ^{رها} مسل	طا ہرہ بی بی	_10
& har now	13503-188484	جی جی پی ایس کنڑے ہا - کا	شهناز بي بي	_11
di	43301-8572981.8	جى جى بى الس السوية المرتارنج	سعدیہ بی بی	**
San	13504-057482	جی جی پی ایس موراتاں ۔ 8 ج	صائمه بها والون	_114
. .	13503-949386	جى جى بى ايس كنڌ پائيں 4 – <	فرینه بی بی	_1r
barlier	13503-7790636	. تى جى بي ايس مرادو	صفيه بي بي	_10
NSW	10300		$\hat{\zeta}$	_ ا

Tomine

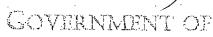
عرف بالمارى مرائ بالمارى مرائ بالمارى مرائ المارى مرائ بالمارى مرائ بالمارى مرائل بالمارى مرائل بالمارى مرائل بالمارى والمارى
الله المعلق الم

المناز المان المناز المناز المن المناز المن

ئيداميرانى فرماكر مارى درخواست يرغورك واع

of int





KHYBER PAKHTUNKHWA

ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

No. SO E&SED (P/F)2-1/Torghar/2023.

Dated Peshawar, the 24th July, 2023

 T_{ij}

The Director, E&SE Khyber Pakhtunkuwa, Peshawar.

Subject: -

<u>OPPARTMENTAL APPEAL</u>

I am directed to refer to the subject cited above and to enclose herewith a copy of self-explanatory of joint appear submitted by Bibi Salma Nagar GGPS Bembal District Torghan and others for submission of views/comments within 07-days positively for further processing of the case accordingly.

Book As above.

SECTION OFFICER APPE

Endst: of area No & date: -

Copy forwarded to the: -.

1 PS to Secretary E&SE Department Klryber Pakhtunkhwei

2. Master File.

ALEGADA OF PROTUBLES



GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENIARY & SECONDARY EDUCATION DEPARTMENT

No. <u>SO/E&SED (P/F)2-1/Torghar/2023</u> Dated Peshawar the 24th July, 2023-11-30

Ta

The Director

E&SE Khyber Pakhtunkhwa

Peshawar

Subject; DEPARTMENTAL APPEAL.

I am directed to refer the subject cited above and to enclose herewith a copy of above explanatory of joint appeal submitted by Bibi Salma Nagar GGPS

Bembal District Toughar and others for submission of views/ comments within 07
Days positively for further processing of the case accordingly.

Ends As above.

SECTION OFFICER (P/F)

Endst: of even No & date:

Copy forwarding to the:-

- 1. PS to Secretary E&SE Department Khyber Pakhtunkhwa.
- 2. Master File.

SECTION OFFICER (P/F)

